IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1979

79-6361

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SUPREME COURT, U.S.

NO. ~~77-1040~~

BRUCE ANTHONY COLLOM,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS

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April 1, 1980

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UNITED STATES COURT OF APPEALS

The Petitioner, BRUCE ANTHONY COLLOM, prays that a writ of certiorari issue to review the judgment and opinion of the United States Court of Appeals for the Ninth Circuit entered on June 15, 1978.

OPINION BELOW

The Opinion of the Court of Appeals, as yet unreported, appears at Appendix A, infra pp to . The Appellate Division affirmed the judgment of the United States District Court for the Central District of California.

JURISDICTION

The judgment of the Court below (Appendix A) was entered on June 15, 1978. On December 19, 1979 an Order enlarging time to file a Petition for Rehearing on the amended opinion was

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granted giving Petitioner sixty days to File the Petition for Rehearing from the date the Order was filed. A timely Petition for Rehearing was denied on March 5, 1980. The jurisdiction of the Court is invoked under 28 U.S.C. 1254 (1).

QUESTIONS PRESENTED FOR REVIEW

1. Whether Petitioner was substantially prejudiced by the District Courts failure to give the requested jury instruction regarding delusion.

2. Whether the trial court improperly denied Petitioners Motion for Judgment of Acquittal based on the government's failure to prove beyond a reasonable doubt that defendant was sane during the commission of the alleged crime.

3. Whether Petitioner was afforded effective counsel as guaranteed under the Sixth Amendment of the United States Constitution.

4. Whether the trial court abused its discretion in failing to grant Petitioner a continuance of trial.

CONSTITUTIONAL PROVISIONS INVOLVED

Constitution of the United States, Amendment VI

> "In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance for Counsel for his defence."

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STATEMENT OF FACTS

In the opening statement on behalf of the petitioner it was admitted that the petitioner on September 30, 1976 robbed the Garden Grove Savings & Laon Association of $3,400.00 [R.T. pp. 230-231 (Refers to Reporter's Transcript of Proceedings)].

The petitioner's defense was that he was legally insane ~~at the time of the offense [R.T. p.231]~~.

The defendant's first witness was Mrs. Beverly F. Grosvenor [R.T. p. 235]. She has known petitioner since the 1950's.

During the two week period prior to the September 30, 1976 robbery of the Garden Grove Savings and Loan, Mrs. Grosvenor was with the petitioner constantly at his mother's residence [R.T. p. 239]. Mrs. Grosvenor observed the petitioner's constant pacing and his inability to sleep or eat. He told Mrs. Grosvenor that he was sent,". . . to save all of us. . ." and that he was Jesus Christ [R.T. pp.240-241]. The petitioner told Mrs. Grosvenor that he thought the world was bad and he was on the earth to save people [R.T. p.241]. She tried to get the petitioner to go to a mental institution because she was afraid he was going to commit suicide [R.T. pp.241 -242].

The petitioner's second witness was Mr. James Timothy Donovan who is a parole service associate for the State Department of Corrections, Division of Community Services [R.T.253]. He has known the petitioner since approximately 1956 [R.T.254].

Mr. Donovan met with the petitioner at the petitioner's mother's home on approximately December of 1975 [R.T. pp 256-257]. The defendant stated he had been designated to, ". . . alleviate

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the poverty and suffering and the lack of love in the world." [R.T. pp. 257-258].

Starting late spring through the summer of 1976 Mr. Donorvan and the petitioner had telephone conversations with each other during which the petitioner told Mr. Donovan that, ". . .certain occurrences in his life during that period had tended to prove to him his calling and the correctness of his early vision," [R.T. pp. 258-259].

The petitioner's third witness was Mr. David Allen Spatrick, a vocational counselor with the State Department of Rehabilitation. This agency's purpose is to assist people who are emotionally or physically disabled get a job [R.T. pp. 267-268].

In July, 1974 the petitioner was enrolled in an Attorney Assistance Program at UCLA through Mr. Spatrick's agency [R.T. p.270]. Mr. Spatrick was present during the petitioner's attendance at one class of the program. After the class the petitioner told Mr. Spatrick that, ". . . he was the reincarnation and that he was all the world's problems rolled into one person, . . ." [R.T. pp.272-273].

Dr. Alvin E. Davis, M.D., a Board Certified Psychiatrist, testified at great length regarding the petitioner's mental condition at the time of the commission of the offense [R.T.pp. 298-347]. Dr. Davis testified that (1)he had interviewed petitioner on several occassions including an interview in May of 1976, prior to the commission of the offense on September 30, 1976 and (2) he had reviewed a one page clinical history report on petitioner from Oregon State Hospital and (3) he

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viewed a videotape which had been shown to the jury of petitioner's conduct and (4) he read certain crime reports and (5) he had taken petitioner's history. [R.T. pp. 302-308; R.T. p. 337, line 13 to R.T. p. 338, line 20; R.T. p. 343, line 2 to R.T. p. 344, line 19].

Dr. Davis testified that, based upon all the material available to him and on his interviews with petitioner, it was his opinion:

1. That petitioner lacked substantially a very great degree of the ability necessary to appreciate the moral wrongfulness of his behavior at the commission of the alleged crime. [R.T. p. 309, lines 6-8].
2. That on the date of the alleged offense, and prior thereto, petitioner suffered from major mental illness, specifically a mixture of paranoid schizophrenia and schizo-affective schizophrenia [R.T. p. 309, lines 14-16].
3. That at the time of the alleged offense, petitioner was delusional and suffered from hallucinations.[R.T. p. 309, line 17 to p. 310, line 13; R.T. p.341 , lines 17-21].
4. That at the time of the alleged offense, petitioner had a great worsening of his mental illness. [R.T. p.310,lines 14-23].
5. That on the date of the alleged offense, petitioner could not conform his conduct to legal requirements [R.T. p. 310 line 24 to p.311 line 7].

The Government's expert witness, Dr. Saul J. Faerstein, a psychiatrist, in response to a question propounded by the Court,testified that he had no doubt that petitioner suffered

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from a very serious mental illness [R.T. p.367, lines 12-16]. That Dr. Faerstein had a difference of opinion with Dr. Davis' as to whether petitioner appreciates the moral wrongfulness of his conduct and is able to conform to the requirements of law [R.T. p. 36, lines 17-22].

Dr. Faerstein further testified that if he had reviewed ~~certain information as to petitioner's conduct during the two week period prior to the alleged offense before reaching his~~ opinion, he might have changed his opinion as to petitioner's capacity [R.T. p. 367, line 23 to p. 371, line 14].

The records indicated that petitioner was hospitalized for mental problems (1) at Oregon State Hospital in 1971, 1972 and 1973; (2) at Golden State Hospital in 1974; (3) at Metropolitan State Hospital in 1975; and (4) at California Medical Facility at Vacaville in 1975. [R.T. p. 366]. That the medical records for these hospitalizations were not obtained and consequently were not available to be offered in evidence or furnished to the psychiatrists for their assistance in rendering their opinions as to petitioner's competentcy.

That a one hour and twenty minute videotape of petitioner being interviewed was exhibited to the jury [R.T. pp.291-296].

The trial Court instructed the jury on the issue of sanity as follows:

> "In determining the issue of sanity, I further instruct you that a person is considered legally insane and therefore not responsible for criminal conduct, if at the time of such conduct, as a result of mental disease or defect, he lacks substantial

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> capacity either to appreciate the moral wrongfulness of his conduct, or to conform his conduct to the requirements of law." [R.T. p.437].
>
> "Now for the purposes of the insanity defense, wrongfulness means moral wrongfulness rather than criminal wrongfulness." [R.T. p.440].

Petitioner's counsel,after reading of the instructions, orally requested that the trial court give the following instruction approved in the cases of Wade v. United States, 426 F.2d at 71-72 and in McGraw v. United States, 515 F.2d at 759-760:

> "You are instructed that the defendant lacked substantial capacity to appreciate the wrongfulness of his conduct even if he knows his act to be criminal, but commits it because of a delusion that it was morally justified." [R.T.p.446].

The Court refused the giving of the above requested instruction stating that the instruction was not applicable and that there was no evidence to show that at the time of the robbery the petitioner was acting because of a delusion. [R.T.p. 446].

At the conclusion of trial, petitioner made a Motion for Judgment of Acquittal. Said Motion was denied. [R.T. pp 379, line 24 to p 380 line 1].

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REASONS FOR GRANTING THE WRIT

1. Whether Petitioner was substantially prejudiced by the District Court's failure to give the requested jury instruction regarding delusion.

Petitioner's attorney orally requested a further instruction approved in the cases of Wade v. United States (supra) and McGraw v. United States (supra). The Trial Court refused said instruction, stating that there was no evidence that petitioner was acting because of a delusion.[R.T. p. 446].

The Court of Appeals approved the trial court's decision to use only one of the two requested jury instructions relying on United States v. Sullivan 544 F.2d 1052 (1976). Replying to Collom's argument the court on appeal stated:

> "Bruce overlooks that in Sullivan we concluded that either one of two instructions would have been sufficient to meet the Wade standard in that case." [Amended Opin p. 14].

The court in Sullivan on page 1056 stated that:

> "We note in passing that either instruction would have been suitable in the present case, in as much as both accurately reiterate statements made by us in Wade and McGraw."

In the Sullivan case the sole expert witness testifying for the defense agreed that Sullivan was not delusional [p.1054]. Based on this evidence the trial court in Sullivan refused to issue either of the instructions on the ground that there was no evidence presented upon which to submit the factual issue to the jury that the defendant had suffered from a delusion that

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his activities were morally justified.

In the instant case there is substantial and persuasive evidence contained in the testimony of petitioner's witnesses, Mrs. Grosvenor, James Timothy Donovan, Allen Spatrick and Dr. Alvin E. Davis, Psychiatrist, as set forth in these statement of facts, to reasonably support a finding that petitioner's conduct was a result of a delusion. Considering the evidence introduced, such an instruction should have been given.

In U.S. v. Fresonke 549 F.2d 1253 (1977) the defendant was convicted of armed bank robbery, the entire trial revolved around his state of mind with regard to the acts charged. The Appellate court ruled that the district court improperly refused to instruct the jury on the controlling definition of wrongfulness as it pertains to the insanity defense, and further stated:

> "As in Sullivan, the lower court relied on a critical misinterpretation of McGraw in refusing to issue a clarifying instruction on "wrongfulness" on grounds that there was no evidence presented upon which to submit the factual issue to the jury that the appellant had suffered from a delusion that his activities were morally justified. And as in Sullivan, the jury here had been exposed to confusing, if not conflicting concepts of "wrongfulness". Stated simply the expert witnesses' testimony may have cause the jurors confusion. An instruction that for purposes of the insanity defense, wrongfulness means moral wrongfulness rather than criminal wrongfulness, would have

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helped to clear up such confusion. The appellant is entitled to the benefit of the clarifying instruction on such a pivotal concept as wrongfulness and its implications on an insanity defense." at 1256

The testimony of the aforementioned witnesses showed the petitioner to be clearly delusional in believing he was Jesus Christ, that he was the reincarnation and was sent to the world to cure the world's ills. The jury could logically infer that the petitioner might have felt morally justified in committing the robbery while suffering from his delusion, still knowing his act to be criminal. Said instruction requested by petitioner's counsel would have clarified said concept to the jury. Had the delusion instruction been given, petitioner's counsel could have effectively argued the application of said instruction to the evidence in his final argument to the Jury.

Petitioner's entire defense was predicated on the fact that petitioner was suffering from a delusion at the time of the alleged crime that the crime was morally justified. The court's failure to give the delusion instruction was not only prejudicial but was absolutely critical to a proper determination by the jury of the issue involved and thereby denying petitioner a fair trial.

2. Whether the trial court improperly denied Petitioner's Motion for Judgment of Acquittal based on the government's failure to prove beyond a reasonable doubt that petitioner was sane during the commission of the alleged crime.

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In Burks v. United States, 437 U.S. 1 (1978) the defendant was convicted of bank robbery. He had relied on an insanity defense. The Court of Appeals held that he was entitled to a judgment of acquittal because the evidence of his sanity was insufficient and remanded it for a second trial. Burks was not retried because the Supreme Court reversed the order remanding the trial. The Supreme Court held that the Double Jeopardy Clause barred a second trial because Burks was placed in jeopardy at the first trial and then was entitled to a judgment of acquittal:

"It is unquestionably true that the Court of Appeals decision represented a resolution correct or not, of some or all of the factual elements of the offense charged. By deciding that the government had failed to come forward with sufficient proof of petitioner's capacity to be responsible, that court was clearly saying that Burks criminal culpability had not been established. If the district court had so held in the first instance, as the reviewing court said it should have done, a judgment of acquittal would have been entered and of course, petitioner could not be retried for the same offense."

In the recent case of United States v. Bodey 607 F.2d 265 (1979), decided after hearing of the instant appeal, the Court was faced with a similar situation to the instant case in which the defendant had robbed a bank and had based his defense on lack of mental capacity. The Court of Appeals found that the District Court erred when it denied Bodey's motion for a judgment

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of acquittal following the government's failure to prove beyond a reasonable doubt the sanity of Bodey. The Court stated:

> "Bodey's evidence stated a prima facie case of insanity which obligated the government to prove Bodey sane beyond a reasonable doubt." at 268

The Court of Appeals went on to state the government's burden upon the showing of a prima facie case of insanity:

> "Once the defendant has introduced sufficient expert testimony to support a reasonable doubt as to sanity, the government must: (1) introduce its own expert testimony in rebuttal; or (2) discredit the defendant's expert testimony on cross-examination; or (3) rely upon evidence from which the jury may infer that the defendant's expert testimony depends upon an incorrect view of the facts." at 269

In the Bodey case the Court held that the government's evidence of defendant's sanity, which at best was inconclusive, was not sufficient to rebut the defendant's evidence and did not meet the government's burden to prove defendant sane beyond a reasonable doubt.

In the instant case the government's sole expert witness, Dr. Faerstein, testified that petitioner suffered from a serious mental illness and had he received certain information regarding petitioner's behavior as testified by other witnesses in this case he might alter his conclusion [R.T. pp. 367-371]. The government failed to discredit the petitioner's expert testimony

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on cross-examination. There was insufficient evidence from which the jury could reasonably infer that the petitioner's expert testimony depended upon an incorrect view of the facts.

In the case of United States v. Segna 555 F.2d 226 (1977) the defendant was convicted of first degree murder. The only contested issue of the trial was the legal sanity at the time of the offense of Segna. Segna introduced substantial evidence that he was not legally responsible for the killing because of a mental disease or defect. The evidence consisted of the testimony of three psychiatrists, one psychologist and several lay witnesses and various exhibits including letters written by Segna before the killing. All of these expert witnesses agreed that Segna was suffering from a fixed delusionary system, the central feature of which was Segna's belief that he was a persecuted Indian. Based upon this evidence the Court stated:

> "This evidence clearly destroyed the presumption of sanity and placed on the government the burden of establishing Segna's sanity beyond a reasonable doubt." at 229

Petitioner submits that the extensive and credible testimony of the petitioner's witnesses far outweighed the inconclusive testimony of government's expert. The government failed to meet its burden of proof to prove petitioner sane beyond a reasonable doubt.

The trial court should have granted petitioner's motion for judgment of acquittal.

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3. Whether Petitioner was afforded effective counsel as guaranteed under the Sixth Amendment of the United States Constitution.

The Sixth Amendment to the United States Constitution guarantees the right to counsel to defendants in a criminal prosecution. The right to counsel is the right to have the effective assistance of counsel. McMann v. Richardson, 397 U.S. 759, 771 (1970).

Petitioner's counsel was appointed on October 18, 1976. Thereafter, counsel for petitioner failed to effectively communicate with petitioner or others having information concerning petitioner's mental history prior to date set for trial. If information had been timely obtained, the necessary records of petitioner's past mental history could have been subpoenaed and appropriate psychiatric witnesses interviewed and subpoenaed, if necessary.

The failure of petitioner's counsel to timely obtain this information relative to petitioner's mental history, effectively deprived petitioner of evidence potentially crucial to his defense.

Petitioner was thereby denied his constitutionally guaranteed right to effective assistance of counsel. In United States v. Lucas 513 F.2d 509 (1975) the District Court upon remand, found that defendant's counsel was inadequately prepared for trial, particularly in failing to seek to contact potentially important witnesses. Based on its findings the District Court concluded:

". . . that defendant did not , in connection

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with his trial or sentencing, receive the reasonably competent assistance of an attorney acting as his diligent conscientious advocate and that since the Government . . failed to meet its burden of proving the absence of prejudice to defendant from the failure of defense counsel adequately to perform their duties, defendant is entitled to a new trial with the reasonably competent assistance of counsel in his behalf." at 512

To establish a claim of ineffective assistance of counsel, the petitioner must demonstrate that counsel failed to render reasonable, effective assitance and the result was a denial of fundamental fairness.

United States v. Elksins, 528 F.2d 236,238 (1975); United States v. Shuey, 541 F.2d 845,849 United States v. Grummel, 542 F. 2d 789,791 (1976).

4. Whether the trial court abused its discretion in failing to grant Petitioner a continuance of trial.

Prior to the commencement of the trial, petitioner requested a continuance of the trial. The request was based upon petitioner's counsel's representations that (a) he had just recently been able to communicate with petitioner; (b) that prior thereto, petitioner's mental condition was such that counsel could not talk to him in an intelligent manner and receive information concerning his previous mental history; (3) that

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petitioner's former wife had just been released from a state facility and had just recently provided counsel with information concerning petitioner's past mental history.

Counsel for petitioner represented that it was extremely important for counsel to pursue the past mental history of petitioner and consult with the physicians and psychiatrists who had treated petitioner.

That Court denied said motion. [R.T. p.54, line 20 to p. 57, line 11].

The defense of petitioner was predicated upon petitioner's claim of insanity at time of commission of the alleged offense.

Counsel for petitioner made a showing that because of the inability of the petitioner to properly communicate to his counsel, counsel had not secured the necessary documentary evidence and had not interviewed the necessary prospective witnesses.

A continuance would have permitted petitioner's counsel to secure materials necessary for petitioner's defense including the medical records of the various institutions in which petitioner had been hospitalized and treated. [R.T. p.366].

The result of the Court's refusal to grant a continuance deprived petitioner of his opportunity to present evidence potentially effective to his defense. The furnishing of these materials would have also been potentially persuasive in assisting the psychiatrists, Dr. Davis and Dr. Faerstein, in evaluating the condition of petitioner prior to their testimony.

This issue was presented to the Court in United States v. Raymond M. Fessel 531 F.2d 1275 (1976) at 1279-1281. In the Fessel case, the petitioner filed a motion for continuance on the

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basis that he had not known until two days before trial that he was going to trial and that his attorney had failed to secure important psychiatric information. The defendant alleged his need for psychiatric testimony and records. The trial judge denied the request. The Court of Appeals found that the refusal of the trial court to grant a continuance deprived the accused of the opportunity to present evidence necessary to his defense. The Court held that the failure of the trial judge to grant the continuance to permit the defendant time to secure such information denied defendant a fair trial and constituted an abuse of discretion.

CONCLUSION

For these reasons, a writ of certiorari should issue to review the judgment and opinion of the United States Court of Appeals for the Ninth Circuit.

Respectfully submitted,

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